

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

NAVBLAZER, LLC,

Apple

v.

**SAMSUNG ELECTRONICS CO.,
LTD (A KOREAN COMPANY) AND
SAMSUNG ELECTRONICS
AMERICA, INC.,**

Defendants

Case No. 6:20-cv-89

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

NavBlazer, LLC (“NavBlazer”) hereby files this Original Complaint for Patent Infringement against Samsung Electronics Co., LTD (a Korean Company) (“Samsung Electronics”) and Samsung Electronics America, Inc. (“Samsung Electronics America”), (collectively, “Samsung”), and alleges, upon information and belief, as follows:

THE PARTIES

1. NavBlazer is a limited liability company organized and existing under the laws of the State of Florida with its principal place of business at 600 S. Dixie Highway, Suite 605, West Palm Beach, Florida 33401.
2. Upon information and belief, Defendant Samsung Electronics Co., LTD is a company organized and existing under the laws of the Republic of Korea with its principal offices at 250, 2-ga, Taepyong-ro, Jung-gu, Seoul, 100-742, South Korea. Samsung Electronics Co., LTD may be served with process

by serving its wholly owned subsidiary, Samsung Electronics America, Inc., via its registered agent CT Corporation System at 1999 Bryan St., Suite 900, Dallas, TX 75201-3136.

3. Upon information and belief, Samsung Electronics America, Inc. is a company with a principal place of business at 105 Challenger Road, 6th Floor, Ridgefield Park, New Jersey 07660. Samsung Electronics America, Inc. may be served through its registered agent, CT Corporation System, at 1999 Bryan St., Suite 900, Dallas, TX 75201-3136.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this case under 28 U.S.C. §§ 1331, 1332, 1338, and 1367.
5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400(b).
6. This Court has personal jurisdiction over Samsung. Samsung has continuous and systematic business contacts with the state of Texas. Samsung, directly or through subsidiaries or intermediaries (including distributors, retailers, and others), conducts its business extensively throughout Texas, by shipping, distributing, making, using, offering for sale, selling, and advertising (including the provision of interactive web pages) its products and services in the state of Texas and the Western District of Texas. Samsung, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), has purposefully and voluntarily placed infringing products and services into this district and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this district. Samsung has offered and sold and continues to offer and sell these infringing products and services in this district, including at physical Samsung stores located within this district. Samsung and its customers also commit additional acts of direct infringement in this district with respect to each asserted patent through their infringing use

of the accused devices, including Samsung's servers, in this district, including when Samsung and its customers put the accused devices into service and receive a benefit, and Samsung is liable for these additional acts of direct infringement and indirect infringement in this district. Samsung has committed acts of infringement, both direct and indirect, in this district with respect to each asserted patent and has a regular and established place of business in this judicial district. For example, Samsung Electronics America maintains regular and established place offices in the Western District of Texas, including at 12100 Samsung Blvd, Austin, Texas 78754 and 2800 Wells Branch Pkwy, Austin, Texas 78728. Further, upon information and belief, Samsung Electronics directs and controls the actions of Samsung Electronics America such that it too maintains regular and established offices in the Western District of Texas, including at 12100 Samsung Blvd, Austin, Texas 78754, and 2800 Wells Branch Pkwy, Austin, Texas 78728. Samsung Electronics also owns and operates a manufacturing facility in Austin, Texas. In addition, Samsung Electronics, and Samsung Electronics America have placed or contributed to placing infringing products into the stream of commerce via an established distribution channel knowing or understanding that such products would be sold and used in the United States, including in the Western District of Texas. On information and belief, Samsung Electronics and Samsung Electronics America also have each derived substantial revenue from infringing acts in the Western District of Texas, including from the sale and use of infringing products. Samsung Electronics America has maintained regular and established places of business at 12100 Samsung Blvd, Austin, Texas 78754 and 2800 Wells Branch Pkwy, Austin, Texas 78728.

U.S. PATENT NOS. 9,075,136 AND 9,885,782

7. NavBlazer is the owner, by assignment, of U.S. Patent No. 9,075,136 and 9,885,782, each entitled “VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD” (hereinafter collectively referred to as “the Patents-in-Suit”).
8. The patent application that issued as the ’782 Patent is a continuation application of U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, and entitled “VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD”, now U.S. Pat. No. 9,075,136. U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, claims priority to U.S. Provisional Patent Application Ser. No. 60/076,800, filed March 4, 1998, and entitled “VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD.”
9. The Patents-in-Suit are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.
10. The inventions described and claimed in the Patents-in-Suit were invented by Raymond Anthony Joao.
11. The priority date of each of the Patents-in-Suit is at least as early as March 4, 1998.
12. The Patents-in-Suit relate generally to an apparatus and method for providing a user with one or more possible travel routes to a destination, as well as additional information regarding the one or more possible travel routes, such as traffic conditions, road conditions, traffic flow, weather information and/or other useful information.
13. During prosecution of the ’782 Patent, the patent examiner considered whether the claims of the ’782 Patent were eligible under 35 USC §101 in view of the United States Supreme Court’s decision in *Alice*. The patent examiner found that the claims are in fact patent eligible under 35 USC §101 because all pending claims are directed to patent-eligible subject matter, none of the pending claims

are directed to an abstract idea and there would be no preemption of the abstract idea or the field of the abstract idea.

SAMSUNG'S PRODUCTS

14. Upon information and belief, Samsung sells, advertises, offers for sale, uses, or otherwise provides mobile devices that utilize the Android operating system including, but not necessarily limited to, the “Galaxy Fold,” “Galaxy 5G,” “Galaxy S,” “Galaxy Note,” “Galaxy A,” “Galaxy M,” “Galaxy Grand,” “Galaxy On,” “Galaxy C” and “Galaxy J” series of mobile devices (“Accused Instrumentalities”) that infringe the Patents-in Suit.

COUNT I

(Infringement of U.S. Patent No. 9,885,782)

15. Plaintiff incorporates the above paragraphs by reference.
16. Samsung has been on notice of the '782 Patent at least as early as the date it received service of this Original Complaint.
17. Upon information and belief, Samsung has directly infringed and continues to directly infringe at least Claims 1, 2 and 7 of the '782 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities.
18. Samsung, with knowledge of the '782 Patent, also infringes at least Claims 1, 2 and 7 of the '782 Patent by inducing others to infringe the '782 Patent. In particular, Samsung intends to induce its customers to infringe the '782 Patent by encouraging its customers to use the Accused Instrumentalities in a manner that results in infringement.
19. Samsung also induces others, including its customers, to infringe at least Claims 1, 2 and 7 of the '782 Patent by providing technical support for the use of the Accused Instrumentalities.

20. Upon information and belief, at all times Samsung owns and controls the operation of the Accused Instrumentalities in accordance with an end user license agreement.
21. By way of example, the Accused Instrumentalities infringe Claim 1 of the '782 Patent by use of a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle. Samsung's "Galaxy S10" is a representative example of the Accused Instrumentalities and is a mobile device (apparatus). See Figure 1 below, which is a screenshot from Samsung's website showing a picture of the Galaxy S10.



Figure 1¹ - Samsung's Galaxy S10

22. The Galaxy S10 uses a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle.
23. See Figure 2 below, which is a screenshot from Samsung's website indicating the Galaxy S10 utilizes GPS location technology. A GPS device is necessarily required to utilize GPS location technology.

¹ <https://www.samsung.com/us/mobile/phones/galaxy-s/galaxy-s10-plus-512gb-unlocked-sm-g975uckexaa/#specs> - 9/14/19

Further, it is well known that GPS location technology determines a location of the apparatus on which the GPS device is installed or located.

Connectivity		
Wi-Fi Connectivity 802.11 a/b/g/n/ac/ax 2.4G+5GHz, HE80, MIMO, 1024-QAM	USB ? USB 3.1 Gen 1	Bluetooth Bluetooth v5.0
ANT+ Yes	Location Technology GPS, Glonass, Galileo	Earjack 3.5mm Stereo
Wi-Fi Direct Yes	NFC Yes	PC Sync. Smart Switch (PC version)

Figure 2² - Galaxy S10 Specs

24. See also Figure 3 below, which is an excerpt from the Galaxy S10 User's Manual, indicating that the Galaxy S10 is loaded with the Google Maps application.

² <https://www.samsung.com/us/mobile/phones/galaxy-s/galaxy-s10-plus-512gb-unlocked-sm-g975uckexaa/#specs> - 9/14/19

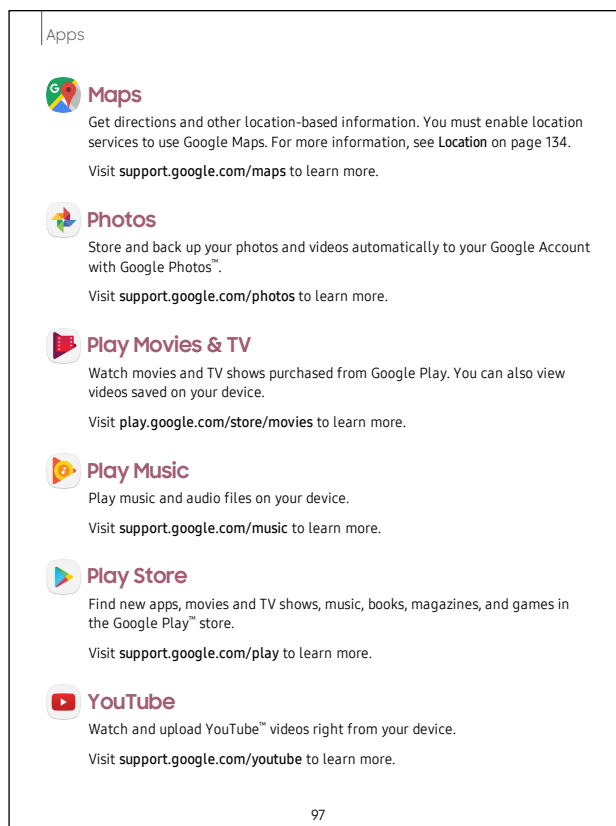


Figure 3³ - Page 96 of the Galaxy S10 User's Manual

25. See also Figure 4 below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps. The blue arrow indicates the current location of the device.

³ Samsung Galaxy S10e|S10|S10+ User Manual – page 96

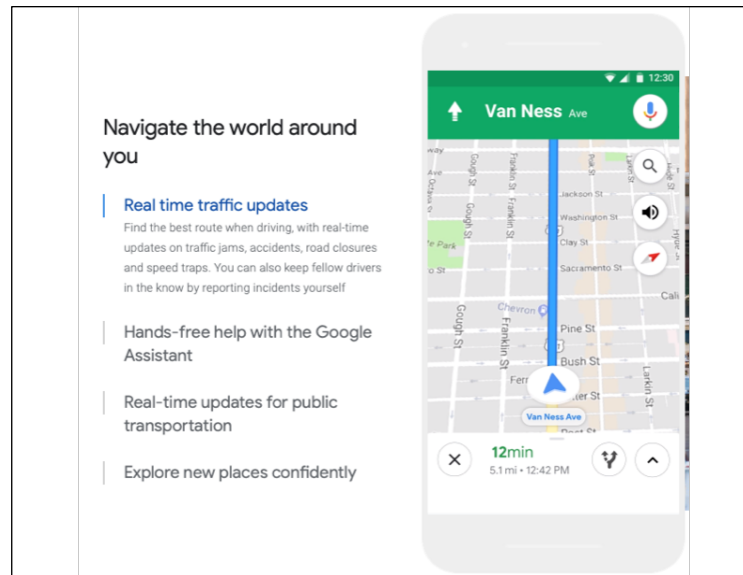


Figure 4⁴ - Google Maps navigation display

26. The Galaxy S10 uses a processing device, wherein the processing device processes information regarding the location of the apparatus or the location of the vehicle and information regarding a destination, wherein the processing device determines or identifies a travel route to the destination on or along a road, a roadway, a highway, a parkway or an expressway.
27. See Figure 5 below, which is a screenshot of Samsung's website explaining that "A more powerful processor and up to 12 GB of RAM means better performance with less energy."

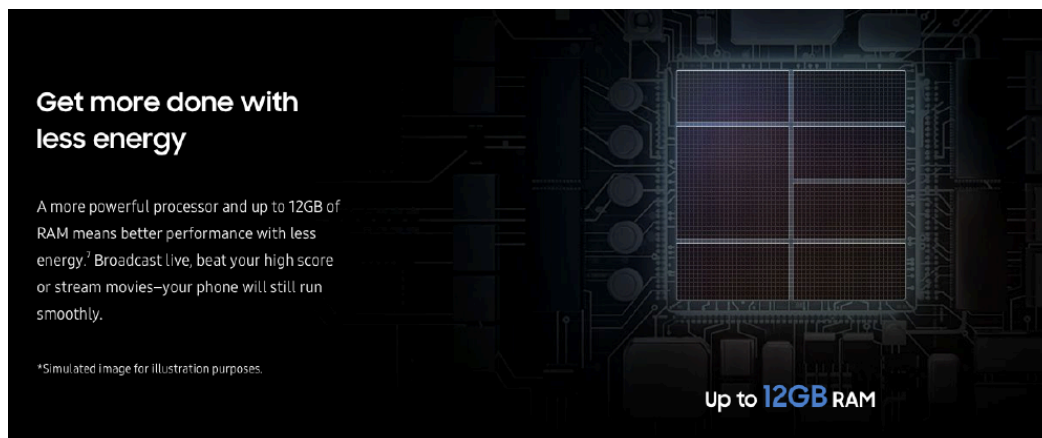


Figure 5⁵ - Galaxy S10 processor

⁴ <https://www.google.com/maps/about/#!/#jump-link> - 9/14/19

⁵ <https://www.samsung.com/us/mobile/galaxy-s10/performance/?fromHL=true> - 9/14/19

28. The processing device used in the Galaxy S10 is necessarily used to process the information regarding the location of the apparatus or vehicle and the destination, as well as to calculate the travel route to the destination using the Google Maps application that is included with the Galaxy S10.
29. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

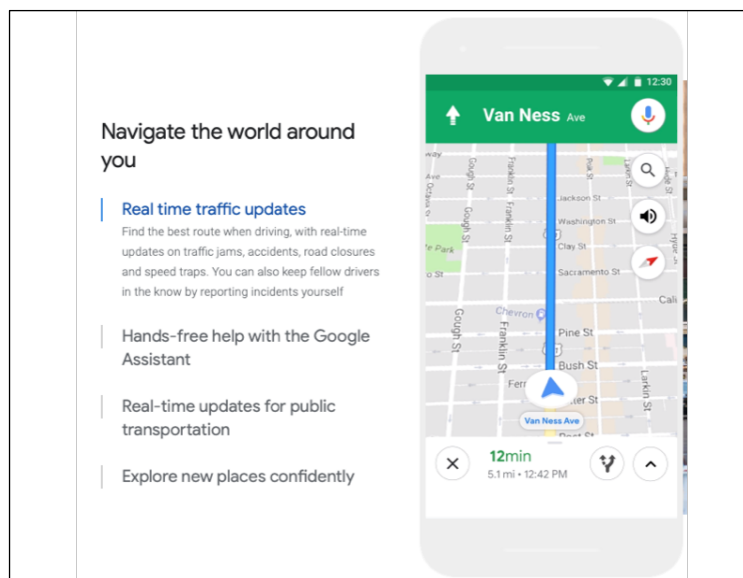


Figure 4 - Google Maps navigation display

30. The Galaxy S10 uses a display device or a speaker, wherein the display device displays information regarding the travel route or the speaker provides audio information regarding the travel route.
31. See Figure 1, reproduced below, showing the display of the Galaxy S10.



Figure 1 - Samsung's Galaxy S10

32. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

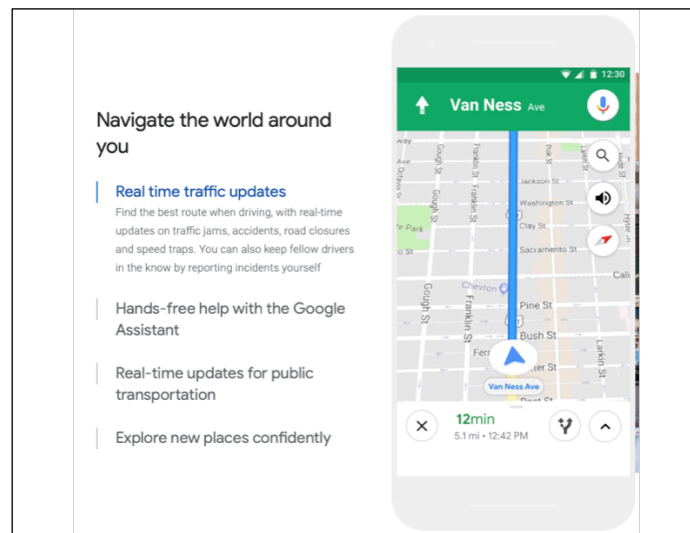


Figure 4 - Google Maps navigation display

33. The Galaxy S10 uses a receiver, wherein the receiver receives traffic information or information regarding a traffic condition.
34. See Figure 6 below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display. The device running the Google Maps application, such as the Galaxy S10, must necessarily include a receiver for receiving real-time traffic information.

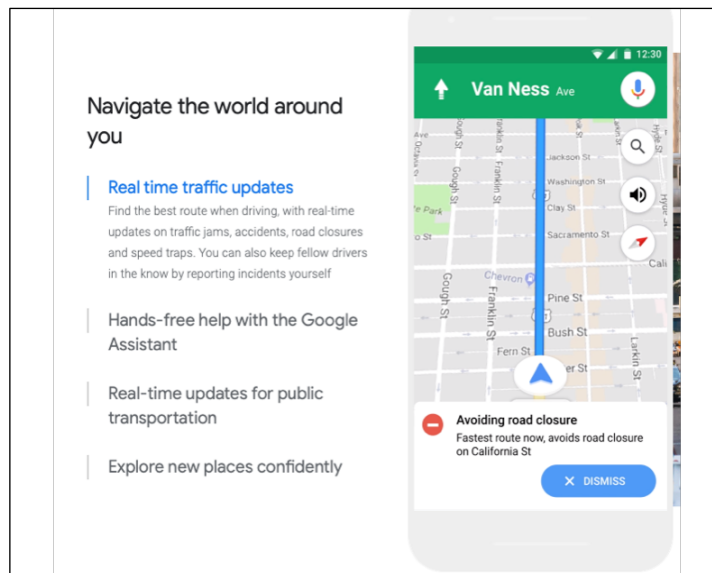


Figure 6⁶ - Google Maps navigation display

35. The Galaxy S10 provides the traffic information or the information regarding a traffic condition via the display device or via the speaker.
36. See Figure 1, reproduced below, showing the display of the Galaxy S10.

⁶ <https://www.google.com/maps/about/#!/#jump-link> - 9/14/19



Figure 1 - Samsung's Galaxy S10

37. See also Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display.

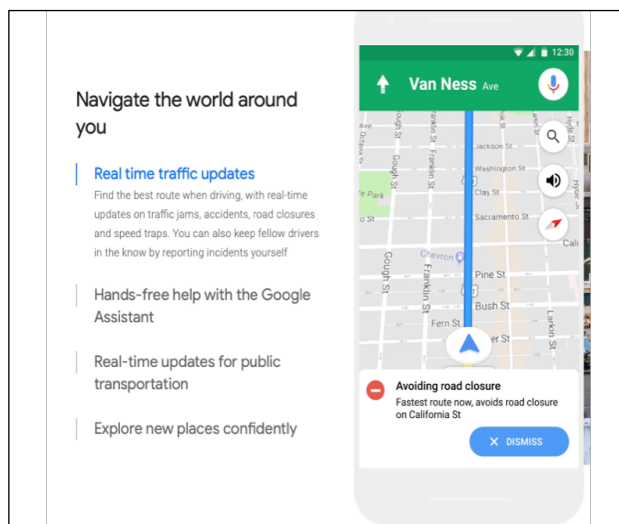


Figure 6 - Google Maps navigation display

38. By way of another example, the Accused Instrumentalities infringe Claim 7 of the '782 Patent by use of an apparatus that “receives maintenance information associated with the travel route or maintenance information associated with a second travel route to the destination, and further wherein the apparatus provides the maintenance information associated with the travel route or the maintenance information associated with the second travel route via the display device or the speaker.”
39. See Figure 7 below, which is a screenshot from Google’s website explaining the meaning of various visual symbols used in the Google Maps application. The visual symbols include symbols indication “road closures” and “construction,” both of which can be considered “maintenance information.” Figure 7 also indicates that “[f]or road closures, you’ll find a dotted red line where the road is closed.” These symbols are visually displayed on the map that is displayed on the display device of the Accused Instrumentalities.



Figure 7⁷ - Visual Symbols in the Google Maps Application

(Infringement of U.S. Patent No. 9,075,136)

40. Plaintiff incorporates the above paragraphs by reference.

41. Samsung has been on notice of the '136 Patent at least as early as the date it received service of this Original Complaint.

42. Upon information and belief, Samsung has infringed and continues to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities.

⁷ https://support.google.com/maps/answer/3092439?hl=en&ref_topic=3093390 – 2/5/20

43. Samsung, with knowledge of the '136 Patent, infringes at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by inducing others to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent. In particular, Samsung intends to induce its customers to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by encouraging its customers to use the Accused Instrumentalities in a manner that results in infringement.
44. Samsung also induces others, including its customers, to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by providing technical support for the use of the Accused Instrumentalities.
45. Upon information and belief, at all times Samsung owns and controls the operation of the Accused Instrumentalities in accordance with an end user license agreement.
46. By way of example, the Accused Instrumentalities infringe Claim 55 of the '136 Patent by use of a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle. Samsung's "Galaxy S10" is a representative example of the Accused Instrumentalities and is a mobile device (apparatus). See Figure 1, reproduced below, which is a screenshot from Samsung's website showing a picture of the Galaxy S10.



Figure 1 - Samsung's Galaxy S10

47. The Galaxy S10 uses a global positioning device, wherein the global positioning device determines a position or a location of a vehicle.
48. See Figure 2, reproduced below, which is a screenshot from Samsung's website indicating the Galaxy S10 utilizes GPS location technology. A GPS device is necessarily required to utilize GPS location technology. Further, it is well known that GPS location technology determines a location of the apparatus on which the GPS device is installed or located.

Connectivity		
Wi-Fi Connectivity 802.11 a/b/g/n/ac/ax 2.4G+5GHz, HE80, MIMO, 1024-QAM	USB ? USB 3.1 Gen 1	Bluetooth Bluetooth v5.0
ANT+ Yes	Location Technology GPS, Glonass, Galileo	Earjack 3.5mm Stereo
Wi-Fi Direct Yes	NFC Yes	PC Sync. Smart Switch (PC version)

Figure 2 - Galaxy S10 Specs

49. See also Figure 3, reproduced below, which is an excerpt from the Galaxy S10 User's Manual, indicating that the Galaxy S10 is loaded with the Google Maps application.

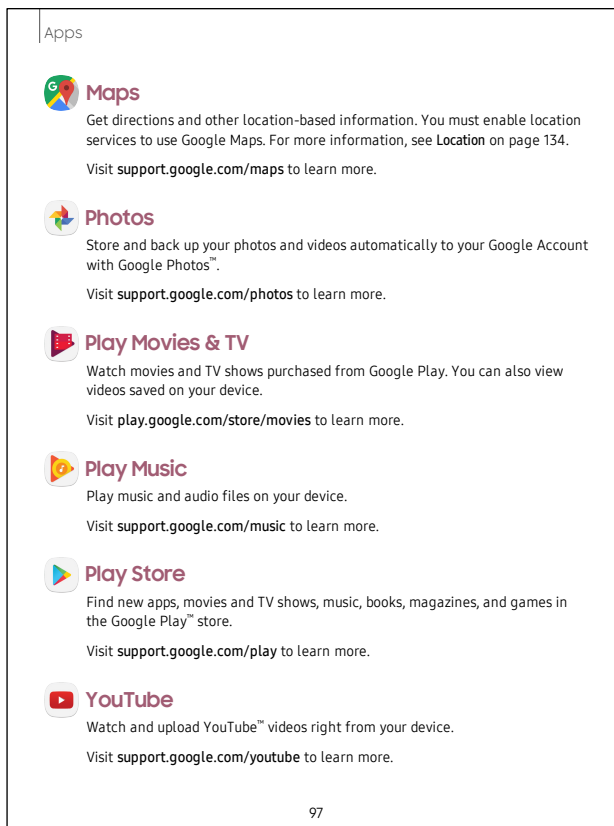


Figure 3 - Page 96 of the Galaxy S10 User's Manual

50. See also Figure 4 below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps. The blue arrow indicates the current location of the device.

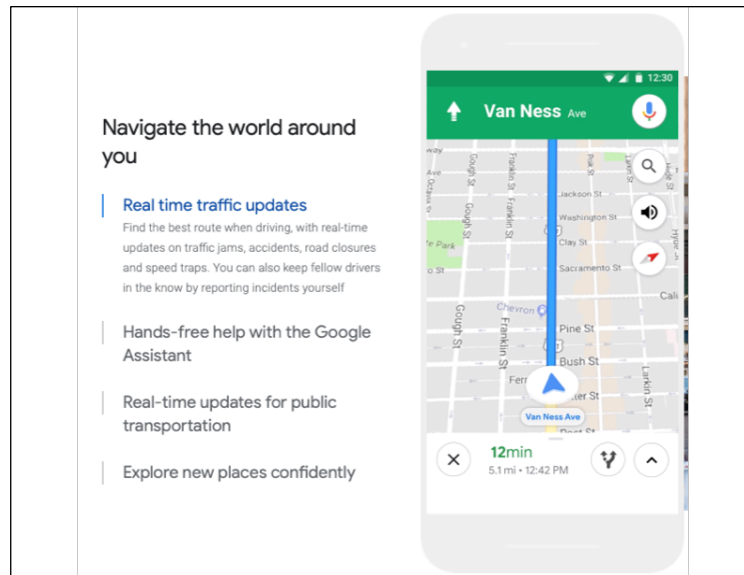


Figure 4 - Google Maps navigation display

51. The Galaxy S10 uses a processing device, wherein the processing device processes information regarding the position or the location of the vehicle and information regarding a destination to which the vehicle can travel on at least one of a road, a roadway, a highway, a parkway, and an expressway, and further wherein the processing device determines or identifies a travel route to the destination.
52. See Figure 5, reproduced below, which is a screenshot of Samsung's website explaining that "A more powerful processor and up to 12 GB of RAM means better performance with less energy."

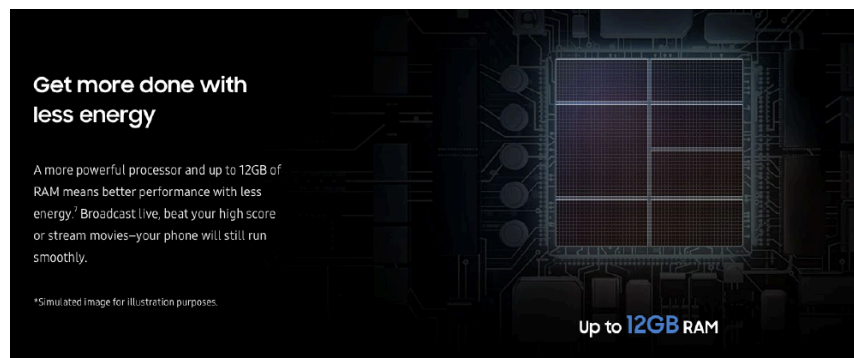


Figure 5 - Galaxy S10 processor

53. The processing device used in the Galaxy S10 is necessarily used to process the information regarding

the location of the apparatus or vehicle and the destination, as well as to calculate the travel route to the destination using the Google Maps application that is included with the Galaxy S10.

54. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

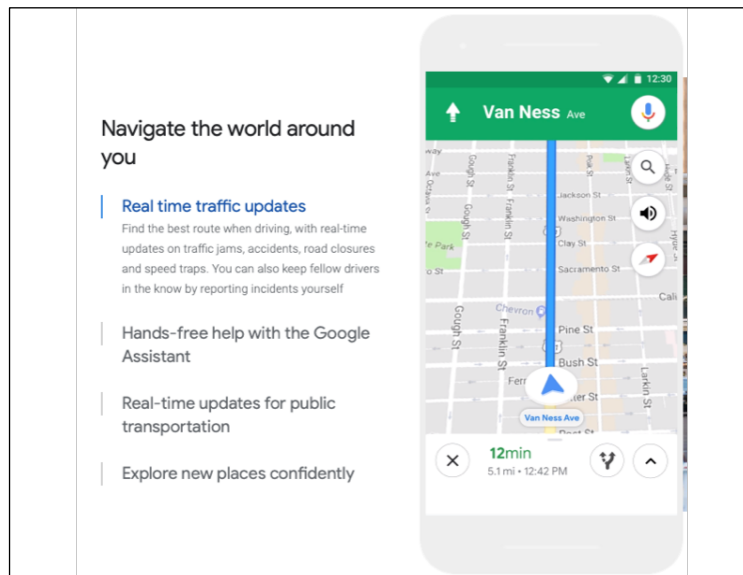


Figure 4 - Google Maps navigation display

55. The Galaxy S10 uses a display device or a speaker, wherein the display device displays information regarding the travel route or the speaker provides audio information regarding the travel route.
56. See Figure 1, reproduced below, showing the display of the Galaxy S10.



Figure 1 - Samsung's Galaxy S10

57. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

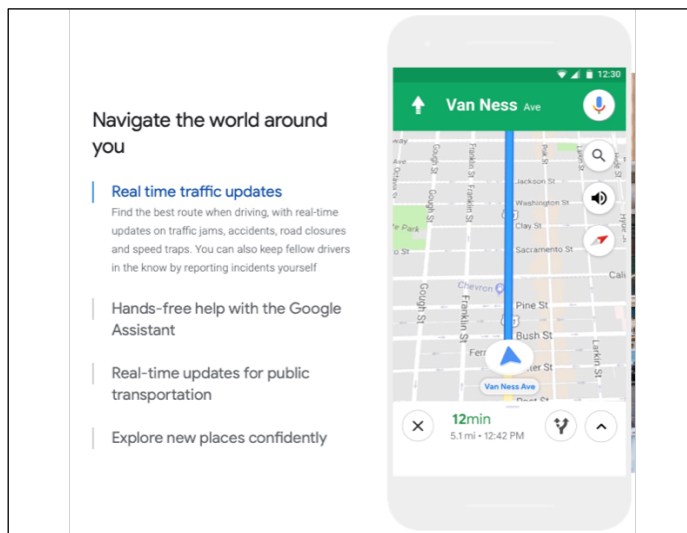


Figure 4 - Google Maps navigation display

58. The Galaxy S10 uses a receiver, wherein the receiver receives traffic information or information regarding a traffic condition, wherein the traffic information or the information regarding a traffic condition is transmitted from a computer, a transmitter, or a device, located at a location remote from the vehicle.
59. See Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display. The device running the Google Maps application, such as the Galaxy S10, must necessarily include a receiver for receiving real-time traffic information.

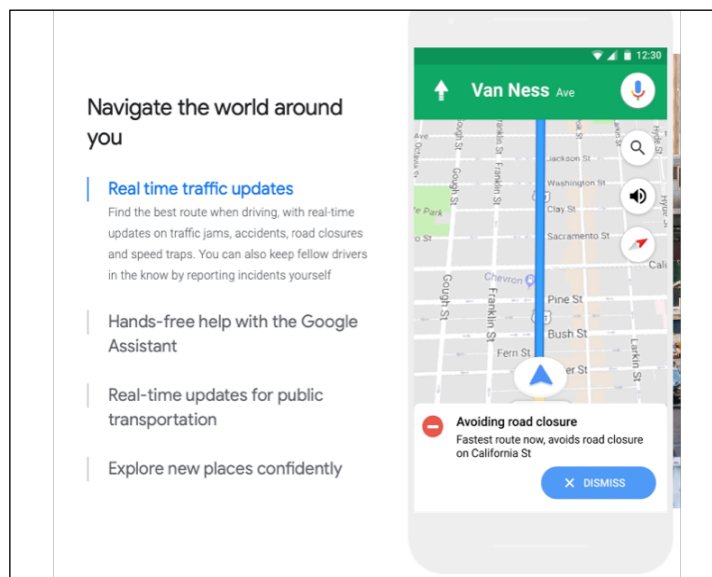


Figure 6 - Google Maps navigation display

60. The Galaxy S10 provides the traffic information or the information regarding a traffic condition at the vehicle via the display device or via the speaker.

61. See Figure 1, reproduced below, showing the display of the Galaxy S10.



Figure 1 - Samsung's Galaxy S10

62. See also Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the Galaxy S10. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display.

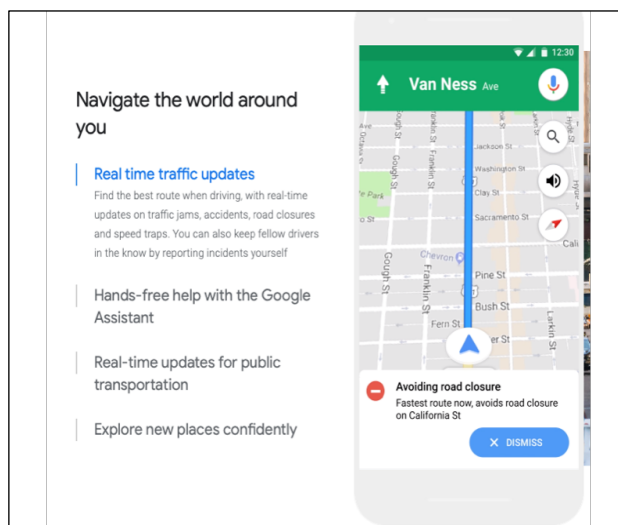
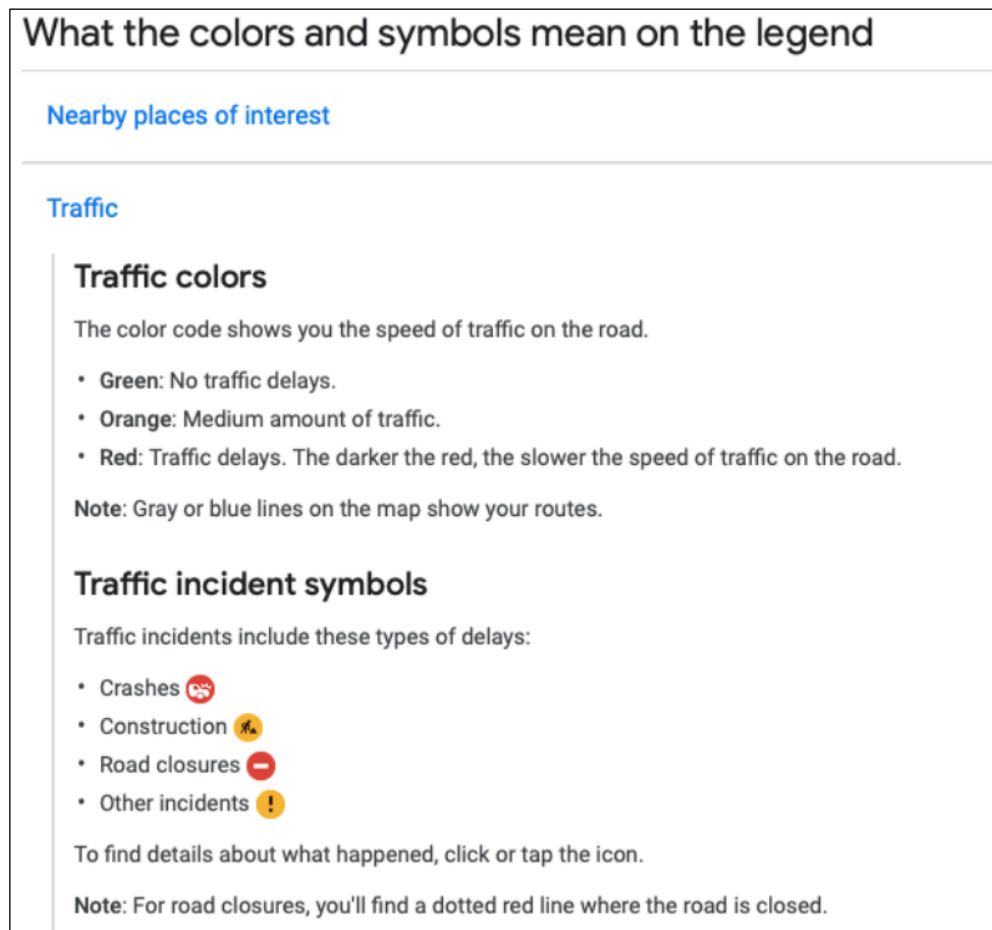


Figure 6 - Google Maps navigation display

63. By way of another example, the Accused Instrumentalities infringe Claims 61 of the '136 Patent by use of an apparatus that “receives maintenance information associated with the travel route or maintenance information associated with a second travel route to the destination, and further wherein the apparatus provides the maintenance information associated with the travel route or the maintenance information associated with the second travel route.”
64. See Figure 7, reproduced below, which is a screenshot from Google’s website explaining the meaning of various visual symbols used in the Google Maps application. The visual symbols include symbols indication “road closures” and “construction,” both of which can be considered “maintenance information.” Figure 7 also indicates that “[f]or road closures, you’ll find a dotted red line where the road is closed.” These symbols are visually displayed on the map that is displayed on the display device of the Accused Instrumentalities.

Figure 7⁸ - Visual Symbols in the Google Maps Application

⁸ https://support.google.com/maps/answer/3092439?hl=en&ref_topic=3093390 – 2/5/20

PRAYER FOR RELIEF

WHEREFORE, NavBlazer respectfully requests the Court enter judgment against Defendant:

1. Declaring that Samsung has infringed each of the Patents-in-Suit;
2. Awarding NavBlazer its damages suffered as a result of Apple's infringement of the Patents-in-Suit;
3. Awarding NavBlazer its costs, attorneys' fees, expenses, and interest;
4. Awarding NavBlazer ongoing post-trial royalties; and
5. Granting NavBlazer such further relief as the Court finds appropriate.

JURY DEMAND

NavBlazer demands trial by jury, under Fed. R. Civ. P. 38.

Dated: February 5, 2020

Respectfully Submitted
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